

Privacy statement Inholland University of Applied Sciences

<2025-1>

Inholland University of Applied Sciences processes your personal data in order to properly perform its legal and educational tasks and to act as a 'good employer'. For example, for internships, extra guidance, study trips or other services, we may need personal data from you. You have the right to expect us to handle your personal data carefully and confidentially. This is legally regulated in the General Data Protection Regulation (GDPR).

We take the protection of your data seriously. We take appropriate technical and organizational measures to prevent misuse, loss, unauthorized access, unwanted disclosure and unauthorized modification.

Inholland University of Applied Sciences is the processor of personal data for the private entity Inholland Academy. The personal data of the participants of the Academy are processed on the basis of a processing agreement concluded between Inholland University of Applied Sciences and Inholland Academy. Inholland Academy has its own privacy statement, which is accessible via the Inholland Academy website. The Data Protection Officer (FG) is also the FG for Inholland Academy.

The information from the partners with whom we (digitally) collaborate also complies with the rules of the GDPR and is regulated in so-called 'processor agreements'.

Why do we process your data?

Orientation or registration

If you are going to orientate yourself for a follow-up study after your secondary school, we request data from you via your website visit(s). With this information we want to guide and inform you as well as possible during your orientation for a follow-up education.

If you use our open days, study choice check days, we ask you for personal data so that we can keep in touch with you during the period of your choice.

Registering as a student

If you register as a student via Studielink, Inholland receives personal data via Studielink for your registration as a student at Inholland. During your study, more personal data and data are recorded by you or teachers for the guidance during your study, about your study progress (grades) and credits in order to ultimately demonstrate, with all this data, that you can graduate. Inholland must also process personal data and study progress data from you, because Inholland must account for itself in the context of accreditations and about the results achieved by students in connection with government funding.

We do this on the basis of the legal basis of 'legitimate interest', as described in the GDPR in article 6.1 under f and on the basis of the legal obligation based on the Higher Education and Research Act (WHW).

Employee

In addition to the personal data of students, Inholland also manages the personal data of employees. This privacy statement also applies to employees and they can also use the rights described.

Information in your interest

In order to inform you as a (prospective) student well and broadly about matters concerning your study, we regularly give an external agency specific assignments to:

- Draw students' attention to the National Student Survey, invite them to an event or share stories of graduated students;

- We wish prospective students success with their secondary school exams, draw their attention to MyStart or point out the introduction weeks;
- We point out the study programmes at Inholland, open days, trial studies and registration to prospective pupils with advertisements. This information is based on search behaviour on the website.

You can indicate yourself via an 'opt-in' whether you want to receive this information.

Inholland processing registers

We store your data carefully. Inholland also complies with the information security standards of SURF (IT umbrella organisation for universities and colleges). We only use the data for the purposes determined by us in advance. These goals and the data we use are described in the register of processing Inholland University of Applied Sciences, which can be requested from the Data Protection Officer of Inholland via the email address

functionarisgegevensbescherming@inholland.nl

How do we obtain your data?

First of all, we receive your data through your registration via Studielink. In addition, you also provide personal data to Inholland yourself, because we need it for your education and guidance as a student.

If your data is required for services that do not fall under a legal obligation or our educational task, we ask your permission to obtain and use your data. We will then explain why that data is required and with whom we may share your data. You are informed that in such a case you are not obliged to provide your data. You may always withdraw your consent. You can read more about this under the heading 'What are your rights?'.

Sharing with others

We only provide your data to other organisations if this is necessary to comply with a legal task or our educational task. We conclude a processing agreement with organisations that process your personal data on our behalf. This is to ensure the same level of security and confidentiality of your data. We remain responsible for this use of your personal data, as the controller.

Children

We do not intend to collect data from website visitors who are younger than 16 years of age, unless they have permission from their parents or guardian. However, our website cannot check whether a visitor is older than 16 years of age. We therefore recommend that parents be involved in the online activities of their children. This prevents their personal data from being collected without your permission.

Research

We sometimes use personal data or provide it to others to conduct research or use it for statistical purposes. There are three options:

- Almost all research works with anonymised research data, so that no one can see that this research is or has been conducted with your data.
- Sometimes it is necessary not to conduct the research anonymously. In that case, we ask your permission in advance to use your data.
- In exceptional cases, obtaining your permission is not possible or not desirable. For example, if this takes a disproportionate amount of time and effort. We will always carefully consider this. You can always object to this. In addition, in these exceptional cases we will always anonymise or pseudonymise your data.

Do you not want us to process your personal data for research? Please let us know, via the email address centralestudentenadministratie@inholland.nl or functionarisgegevensbescherming@inholland.nl

Specific processing

Hogeschool Inholland uses applications for the processing of personal data and participates in several national student surveys. The processing of personal data in these applications and surveys is done in accordance with the requirements of the GDPR and in accordance with the provisions of the, if necessary, concluded processing agreements. For some of these applications and the surveys, we will inform you specifically about the privacy aspects below.

Moodle

The 'learning management system' (LMS) Moodle is GDPR-compliant. This means that the set-up of the authorizations (who has access to the system) is set up on the basis of the rules of the GDPR. For optimal use of Moodle as an LMS, progress reports are kept for the teacher about the study results of a group or student who is being supervised. A class list (list of names) is available for the teacher in Moodle and it is visible which activity has been participated in. This data is accessible to the relevant teacher(s) in the course, and the Moodle administrators of your course.

Plagiarism scanner

The examiner or supervising teacher can perform a plagiarism scan, using the Similarity application, on the submitted work, including theses, to check whether too much text has been used from existing sources. The results of the plagiarism scan are stated in a report with the source and name of the author of the original text. These personal details are visible to the student concerned, the teacher/examiner, team leader of the programme, official secretary of the examination committee and possibly, if an appeal procedure follows, the members of the Board of Appeal for Examinations (CvBE).

Omitting the name of the original author from the report is not possible due to the burden of proof. The programme determines which documents are submitted for the plagiarism scan and this is not reported in advance. The plagiarism scan can be performed from various applications, such as Gradework, Blackboard, Moodle and Onstage.

Schoolyear and Proctorio

Inholland uses the Schoolyear application for a number of courses to secure the on-site test session. This software is used on both students' own laptops (BYOD) and on machines managed by Inholland. Schoolyear is not proctoring software, but is a secure, shielded and controlled environment in which a test can be taken. This environment is only available and accessible during the test session. In this shielded environment, no recordings (video or audio) are made of the student and no live surveillance takes place (not by invigilators watching along or by AI).

In addition, Inholland University of Applied Sciences uses your personal data for a number of specific purposes that are in your interest and also for the university of applied sciences to further improve education. These specific processing operations are:

Alumni network

If you have graduated, Inholland will use your personal data to inform you from time to time about interesting developments in your field, network meetings, seminars, etc. organized by Inholland. Since this is in your interest and does not constitute a detrimental infringement of your privacy, we will use the private email address you provided for this purpose.

If you do not want Inholland to keep in touch with you as an alumni, you can inform the Central Student Administration department (CSA) via:

centralestudentenadministratie@inholland.nl.

HBO-MONITOR

Approximately 1.5 years after your graduation, you will be approached once for a survey called the HBO-MONITOR. This national survey is conducted by the Research Center for Education and the Labor Market (ROA) of Maastricht University and DESAN Research Solutions on behalf of the Association of Universities of Applied Sciences and therefore for all HBO institutions. The research provides information for, for example: supporting pupils in their study choice, information about labour market opportunities of HBO courses, career prospects, etc. This research provides important information that is used for the further improvement of the quality of education and courses, for pupils and new students in their study choice. You can decide for yourself whether or not to participate in this research. The research has no adverse consequences for your privacy, because the research results are anonymised and can therefore no longer be traced back to a person. In order to make this research possible, Inholland provides your address to ROA after you graduate.

If you do not want Inholland to use your address for this research, you can make this known via the email address: centralestudentenadministratie@inholland.nl.

For more information about the approach and implementation of the HBO monitor, see the website: www.hbomonitor.nl

National Student Survey (NSE)

The National Student Survey (NSE) is conducted annually on behalf of the Ministry of Education and Science (OCW). You can decide for yourself whether or not to participate in this survey. The organization CSK (National Center for Study Choice, formerly Studiekeuze123), which conducts the NSE, has taken measures to comply with the GDPR. Inholland provides your personal data to LSCK on the basis of a processing agreement based on the legitimate interest of this survey and the information it provides for further improving education. The survey does not infringe on your privacy, because the research data is anonymized and can no longer be traced back to a person.

For more information about the approach and implementation of the NSE, see the website:

<https://www.nse.nl>

If you have any further questions about these applications and surveys, please contact the Data Protection Officer, via the email address: funtionarisgegevensbescherming@inholland.nl

Cultural barometer Diversity

Inholland has committed itself to the Diversity Charter. An important objective of the charter is to recruit teachers with a non-Western cultural background and thus to form a reflection of society and the student population.

The barometer is provided by Statistics Netherlands (CBS). Inholland supplies personal data from the personnel file to CBS. CBS links this data to the data from the Personal Records Database (Brp) via the BSN. This processing has been coordinated with the Hogeschool Medezeggenschapsraad (HMR) and is described in the Data Protection Impact Assessment Cultural Barometer Diversity.

You will be asked to give permission to pass on your personal data (name and position) to Statistics Netherlands. The data will be treated confidentially and processed securely with Statistics Netherlands. Statistics Netherlands reports are (always) anonymous and therefore cannot be traced back to individuals/persons.

Edubadges and Microcredentials

The Edubadges service is a digital infrastructure for creating and issuing digital evidence for completed educational units or other learning objectives to students.

This digital 'evidence' provides for the further flexibilisation of education to follow education within and outside your own university.

There are two forms of digital evidence, namely:

1. Microcredentials, also called 'formal edubadges'. These are linked to the ECTS credits (study points) that are linked to educational units that you have completed and that are awarded by the examiner and examination board of the university.
2. Edubadges, also called 'non-formal edubadges'. These can be awarded and issued for all kinds of extra-curricular activities. Think of a certificate, for example.

Use of Artificial Intelligence (AI)

Inholland's courses and business operations can make use of AI applications. Inholland follows the standards of the European AI Act for the use of AI. The use is tested in advance by means of an AI Impact Assessment (AIIA) and the AI working group follows the developments and use of AI with guidance.

For questions about the use of AI, you can contact the data protection officer via the email address: functioarisgegevensbescherming@inholland.nl

Safeguarding personal data

In order to enable the creation and issuing (registration-generation-sending) of microcredentials and edubadges to students, personal data is exchanged with SURF, the umbrella organisation for universities and colleges in the Netherlands. To prevent fraud, checks are carried out to verify the applicant and to whom it is awarded.

The system with which the microcredentials and edubadges are created, requested and issued meets the information security requirements of SURF (SURF standards framework) that is based on ISO 27001 and on which Inholland also organises the processing of personal data.

Inholland sees it as a legitimate interest to exchange the personal data of the students concerned with SURF in order to enable the digitalisation of the evidence and the flexibilisation of education for students. For the microcredentials and edubadges service, SURF has carried out a Data Protection Impact Assessment (DPIA), which has been supplemented by Hogeschool Inholland for the specific processing.

Professional doctorate

Hogeschool Inholland is a participant in the Professional doctorate trajectory (PD trajectory) with other universities of applied sciences in the Netherlands. In this trajectory, personal data is processed and shared with the Graduate Committee of the relevant domain. Inholland shares personal data, which are filled in on the PD proposal, with the Graduate Committee. The Graduate Committee shares the result of the assessment with Regieorgaan SIA. The personal data are processed to assess whether the candidate is eligible to start a PD trajectory.

The personal data are also used to monitor and evaluate the PD trajectory. The basis for the processing is the agreement that is concluded with the candidate in the context of the PD trajectory and to be able to comply with it. The PD trajectory runs from January 1, 2023 to December 31, 2030. The personal data of the participants will be stored during this period. After the trajectory, the personal data will be destroyed.

A separate and specific privacy statement is also available for the PD trajectory on the Graduate Committee website and can be obtained from the official secretary of the Graduate Committee.

Learning Analytics

During a student's education, a lot of data is provided by a student, such as the use of learning material, achieving grades, attendance at teaching moments, etc. This data is managed in various educational systems such as Moodle and Peoplesoft studievlog, Testvision and FeedbackFruits.

By combining this study data, better analyses can be performed to increase the study satisfaction and study success of the students. Based on the analyses, the aim is to be able to improve customized advice for the quality and content of the education. By analysing the data of groups of students, lecturers, teaching teams and training management can increase satisfaction with a study unit or the successful completion of a project or unit.

The combination and analysis of the various study data is done within the framework of the Learning Analytics project. Inholland University of Applied Sciences is participating in the development of Learning Analytics with the Study Success lectorate, together with other universities of applied sciences in the SURF context. Learning Analytics is under development and is working with anonymous data.

If you have any questions about the use of this data, you can contact functioanarisgegevensbescherming@inholland.nl.

Student rights

Based on the General Data Protection Regulation, you as a data subject have the right to request the organization to inspect which personal data is processed, to have your personal data deleted, corrected or forwarded.

What are your rights?

You can invoke the following Privacy rights.

Right to information

You have the right to receive clear, understandable and transparent information about the processing of your personal data. This privacy statement is a means for this information provision.

Right to access data

You can ask us to inspect your personal data. You can receive a statement of the personal data that Inholland processes about you without giving a reason. You can only request personal data about yourself, not about others. This is only possible if you can demonstrate that you are requesting data on behalf of someone and/or have obtained permission to do so. You will receive a statement of the personal data that Inholland processes in the relevant applications. You will not be granted access to documents or files on the basis of this GDPR request. Right to delete your personal data

You can submit a request to delete your personal data that Inholland processes or has processed about you. Your request to delete certain personal data must be weighed against the mandatory retention periods under the Archives Act and the selection lists for universities of applied sciences based on it.

Inholland must retain certain personal data based on these selection lists for 50 years (graduation) or 10 years (in connection with financial accountability) or when legal proceedings are still ongoing. We are not allowed to delete this data in that case.

Right to rectify your personal data

If the correct personal data is not registered or is it incomplete, we can adjust or supplement it at your request.

Right to data portability

In some cases, you have the right to receive their personal data in a structured, common and machine-readable format, so that it can be transferred to another organisation.

Withdrawing your consent

If you have given us permission to process your personal data, you can also withdraw this permission. You do this in the same way as you gave permission.

Right to object to the processing of personal data

You can object to the processing of your personal data. You can then ask us to no longer use your personal data. This is not always possible. In such a case, you must be able to demonstrate that the processing may have adverse consequences for you or that your personal data is being processed without a legal basis.

How do you do this?

If you want to invoke your privacy rights, the following applies:

- You can send your request by email to: functionarisgegevensbescherming@inholland.nl or
- You can submit a request by post addressed to the Executive Board of Inholland University of Applied Sciences.
- or
- You can submit your request to the Service Desk of the location where you are studying, by submitting your request in writing and identifying yourself at the Service Desk.
- We will process your request within 1 month. Is your request complex? Then we have an additional two months for this.

Objection and appeal

If your request is not or only partially honored, an explanation will always be given as to why this is the case. You have the right to have this recorded in a decision. You can object to this with the controller. This is the Executive Board of Inholland University of Applied Sciences. The decision states how you can do this.

File a complaint

Are you dissatisfied with the actions of Inholland University of Applied Sciences in dealing with your privacy or processing your personal data? Or do you believe that Inholland has wrongly processed your personal data? Then you can file a complaint with the university, via the email address: functionarisgegevensbescherming@inholland.nl

If we cannot reach an agreement together, you can go to court. You can read more about this in the handling of your complaint. In addition, you can always file a complaint with the supervisory authority, the Dutch Data Protection Authority, if you believe that your rights have been violated. You can read more about this on the website of the Dutch Data Protection Authority (AP), under 'Complaint about the use of personal data'.

Data Protection Officer

The Inholland Data Protection Officer monitors the safeguards of your privacy rights at Inholland University of Applied Sciences. Do you have any questions about the Register of Processing or do you want to report a (suspected) data leak or privacy abuses? Then contact the Data Protection Officer. He can be reached via Inholland's general telephone number and the email address: functionarisgegevensbescherming@inholland.nl

Your website visit

When visiting our website, so-called cookies are placed. We use technical cookies, functional cookies and analytical cookies. A cookie is a small text file that is stored on your computer, tablet or smartphone when you first visit this website.

The cookies we use are necessary for the technical operation of the website and your ease of use. They ensure that the website works properly and remember, for example, your preferences. Cookies are also used to track your surfing behaviour and preferences. This allows us to improve our services to you. However, you can choose to opt out of cookies by

setting your internet browser so that it no longer stores cookies. You can also delete all information that was previously stored via your browser settings.

Camera surveillance

Inholland protects your safety and property, including through camera surveillance in and around the buildings. The camera images are stored for a maximum of 30 days. If certain images are stored, the images will be stored as evidence for longer than the legally prescribed period of 30 days. In such cases, the images are stored until the report has been processed by the police/justice. A Data Protection Impact Assessment has been carried out for the camera surveillance in accordance with the GDPR.

Reporting a data breach

If personal data of students or employees of Inholland have become accessible by 'unauthorised persons' and this was not contractually arranged, then this is a 'data breach'. It is possible that you have caused a data breach or have discovered a (suspected) data breach. Do not hesitate and report a (suspected) data breach to:

- The Service Point of the location where you are
- or
- via the telephone number of the IVT Inholland department: 088-4664247
- or
- send an email to servicepuntIVT@inholland.nl

More information

How Inholland University of Applied Sciences handles personal data and takes security measures is described in the policy notes Privacy Policy and Information Security Policy. On the Privacy and Information Security page on Iris (intranet) you can read, among other things, how we arrange accessibility, privacy and protection of your data on our website and other online services.

This privacy statement is revised annually.

Do you have any questions about your personal data or the GDPR? Please contact the Data Protection Officer via the email address: functionarisgegevensbescherming@inholland.nl

For general information about privacy, please visit the website of the Dutch Data Protection Authority (AP).